

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

TAMMY ALVARADO, CLARA *
REDMOND, TAMMY HAGA, AMY *
RUMINSKI, AND PAMELA *
JOHNSON *
VS. * NO. 4:19-CV-02148
CLARK, LOVE & HUTSON, G.P.; *
LEE & MURPHY LAW FIRM, G.P.; *
CLAYTON A. CLARK; CLAYTON A. *
CLARK, ESQ., PC; SCOTT A. *
LOVE; SCOTT A. LOVE, PC; *
SHELLEY HUTSON; HUTSON LAW *
FIRM, P.C.; JAMES LEE, JR.; *
JAMES LEE LAW FIRM, PC; AND *
ERIN MURPHY *

ORAL AND VIDEOTAPED DEPOSITION OF
JAMES LEE, JR.
OCTOBER 15, 2020
(REPORTED REMOTELY)

1 ORAL AND VIDEOTAPED DEPOSITION OF JAMES
2 LEE, JR., produced as a witness at the instance
3 of the Plaintiffs, and duly sworn, was taken in
4 the above-styled and numbered cause on the 15th
5 day of October, 2020, from 8:58 a.m. to 12:12
6 p.m., before Gail Spurgeon, Certified Court
7 Reporter in and for the State of Texas, reported
8 by machine shorthand remotely, with the witness
9 being located in Dorado, Puerto Rico, pursuant
10 to the Federal Rules of Civil Procedure, the
11 Emergency Orders Regarding the COVID-19 State of
12 Disaster, and the provisions stated on the
13 record.

A P P E A R A N C E S

MR. JAMES M. BEGGS
Beggs Landers Law Firm
140 East Irving Blvd.
Irving TX 75060
jim@beggslaw.com

APPEARING FOR THE PLAINTIFFS

MR. DON JACKSON
MR. K. KNOX NUNNALLY
Ware Jackson Lee O'Neill Smith & Barrow
2929 Allen Parkway
39th Floor
Houston TX 77019
donjackson@warejackson.com

APPEARING FOR THE DEFENDANTS
JAMES LEE, JR.; JAMES LEE LAW FIRM,
PC; LEE & MURPHY LAW FIRM, G.P.
AND ERIN MURPHY

MR. DALE JEFFERSON
Martin Disiere Jefferson & Wisdom
808 Travis Street
Suite 1100
Houston TX
jefferson@mdjwlaw.com

APPEARING FOR THE DEFENDANTS
CLARK, LOVE & HUTSON, G.P.; CLAYTON
A. CLARK; CLAYTON A. CLARK, ESQ. PC,
SHELLEY HUTSON; AND HUTSON LAW FIRM

MR. BILLY SHEPHERD
Shepherd Prewett Miller
770 S. Post Oak Lane
Houston TX 77056
bshepherd@spcounsel.com

APPEARING FOR THE DEFENDANTS
SCOTT A. LOVE AND SCOTT A. LOVE, PC

ALSO PRESENT:

Erin Murphy
Jennifer Black
Will Rain, Videographer

1 did you go to law school at Baylor as well?

2 A. I went to law school at the
3 University of Houston.

4 Q. Okay. And when did you graduate?

5 A. 2003.

6 Q. All right. And where did you go to
7 work out of law school?

8 A. I first started working at McGinnis,
9 Lochridge & Kilgore as my full-time job after
10 law school. I was an associate attorney.

11 Q. How long were you there?

12 A. Several years.

13 Q. Do you recall when you left?

14 A. 2005 maybe. 2006. I don't recall.

15 Q. What kind of work did you do there?

16 A. Corporate litigation and bankruptcy.

17 Q. And then where did you go when you
18 left that firm?

19 A. I went to go work with Clayton Clark.

20 Q. Would that be in Houston?

21 A. Yes.

22 Q. And what was the name of that firm?

23 A. At the time it was Clark Burnett.

24 Q. Do you recall what year that was?

25 A. 2005, 2006.

1 Q. And how long were you there?

2 A. Up until I formed -- I mean -- Clark
3 Burnett turned into Clark, Dean, Burnett, turned
4 into Clark, Burnett, Love & Lee, and then -- and
5 then I left and started my own firm.

6 Q. Do you recall when it turned into
7 Clark, Burnett, Love & Lee, I believe you said?

8 A. I don't exactly but I think it was
9 around 2009, 2010.

10 Q. Okay. Do you recall what firm you
11 were with in 2011?

12 A. Clark, Burnett, Love & Lee.

13 Q. Okay. What about 2012?

14 A. I think in the beginning of 2012 we
15 split and formed Lee Murphy.

16 Q. Okay. And you've been with Lee
17 Murphy ever since; would that be right?

18 A. That's correct.

19 Q. Okay. What's your position with Lee
20 Murphy?

21 A. I'm a partner.

22 Q. Are you managing partner?

23 A. I am.

24 Q. Is that a GP or an LLC or what?

25 A. At the time that we represented these

1 Q. Have you ever seen any correspondence
2 from CLH that you were copied on that was sent
3 to the plaintiffs?

4 A. Only -- only after the lawsuit was
5 filed and discovery was produced.

6 Q. And what period of time, if you
7 recall, did those -- did that correspondence
8 occur?

9 A. The correspondence that I've seen are
10 dated, you know, from years ago. If -- I'm not
11 -- I don't understand your question. I'm sorry.

12 Q. Sure. I was just trying to ascertain
13 what you received -- you said you received
14 copies of correspondence after this lawsuit was
15 filed, so I was asking what -- what period of
16 time that correspondence covered that you
17 received.

18 A. Oh, I see. The -- when I say the
19 correspondence, to me, the main documents that I
20 remember seeing after the lawsuit was filed was
21 the settlement statements, the settlement
22 packets.

23 Q. I see. Okay. I want to be sure I
24 understand your testimony now. You were a
25 partner at Clark, Burnett, Love & Lee, right?

1 A. Yes.

2 Q. Okay. And you would be considered or
3 you testified you're a partner and owner at Lee
4 Murphy, correct?

5 A. Yes.

6 Q. And you've testified, I believe, that
7 Lee Murphy had -- did some legal work and
8 represented three of the plaintiffs; is that
9 correct?

10 A. Yes.

11 Q. Okay. And you -- did you receive
12 legal fees on those cases?

13 A. Only on Ms. Redmond, that we are
14 aware of.

15 Q. Okay. So if the settlement
16 statements say otherwise, you wouldn't have
17 received any of the fees, as far as you know?

18 A. As far as we know right now, we did
19 not receive other fees.

20 Q. Did you get all the legal fees you
21 contracted for?

22 A. Not that I am aware of.

23 Q. So you -- you are owed some
24 outstanding fees; would that be true?

25 A. No. We -- we had a -- we -- and I

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

TAMMY ALVARADO, CLARA *
REDMOND, TAMMY HAGA, AMY *
RUMINSKI, AND PAMELA *
JOHNSON *
VS. * NO. 4:19-CV-02148
CLARK, LOVE & HUTSON, G.P.; *
LEE & MURPHY LAW FIRM, G.P.; *
CLAYTON A. CLARK; CLAYTON A. *
CLARK, ESQ., PC; SCOTT A. *
LOVE; SCOTT A. LOVE, PC; *
SHELLEY HUTSON; HUTSON LAW *
FIRM, P.C.; JAMES LEE, JR.; *
JAMES LEE LAW FIRM, PC; AND *
ERIN MURPHY *

REPORTER'S CERTIFICATION
DEPOSITION OF JAMES LEE, JR.
OCTOBER 15, 2020

I, GAIL SPURGEON, Certified
Shorthand Reporter in and for the State of
Texas, hereby certify to the following:

That the foregoing deposition of
JAMES LEE, JR. Was reported by me
stenographically at the time and place
indicated, said witness having been placed under
oath by me, and that the transcript is a true
record of the testimony given by the witness;

1 I further certify that pursuant to
2 FRCP Rule 30(f)(1) that the signature of the
deponent:

3 X was requested by the deponent or
4 a party before the completion of the deposition
5 and is to be returned within 30 days from date
of receipt of the transcript. If returned, the
attached Changes and Signature Page contains any
changes and the reasons therefor;

6 _____ was not requested by the
deponent or a party before the completion of the
deposition;

7
8 I further certify that I am neither
9 counsel for, related to, nor employed by any of
10 the parties or attorneys in the action in which
11 this proceeding was taken, and further that I am
not financially or otherwise interested in the
outcome of the action.

12 Given under my hand this the
13 23rd day of October, 2020.



14 GAIL SPURGEON
15 Texas CSR 1718
Expires: 11/30/22
16 Firm No. 571
Veritext Legal Solutions
17 300 Throckmorton Street
Suite 1600
18 Fort Worth, Texas 76102
19 817.336.3042
20
21
22
23
24
25